

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: § **Case No. 22-60043**
§
FREE SPEECH SYSTEMS, LLC, §
§
§
DEBTOR. § **Chapter 11 (Subchapter**
§

CORRECTED¹ WITNESS AND EXHIBIT LIST

Judge:	Hon. Christopher M. Lopez
Hearing Date:	Friday, January 20, 2023
Hearing Time:	10:00 a.m. (Central Standard Time)
Party's Name:	Shannon & Lee LLP
Attorney's Name:	R. J. Shannon; Kyung S. Lee
Attorney's Phone:	(713) 714-5770
Nature of Proceeding:	<p>Hearing on:</p> <ul style="list-style-type: none">Shannon & Lee LLP's Motion pursuant to Rule 59 of the Federal Rules of Civil Procedure for Rehearing on the Issue of Disinterestedness with Respect to the Debtor's Application to Employ Shannon & Lee LLP (the "<u>S&L Motion for Rehearing</u>").

Shannon & Lee LLP (“S&L”), the movant in the S&L Motion for Rehearing, hereby submits this supplemental exhibit list in connection with the hearing to be held on Wednesday, January 20, 2022, at 1:00 p.m. (Central Standard Time) (the “Hearing”) on the S&L Motion for Rehearing.

WITNESSES

S&L may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. R. J. Shannon;
2. Kyung S. Lee;

¹ S&L inadvertently did not attach Exhibit 18 indicated below in its filing with the Court. This Exhibit 18 was submitted by Schwartz Associates LLC as Exhibit 16 [ECF No. 386-16] prior to the time that such exhibits needed to be exchanged under Bankruptcy Local Rule 9013-2.

3. W. Marc Schwartz;
4. Any witness called or designated by any other party; and
5. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other party.

EXHIBITS

S&L may offer for admission into evidence any of the following exhibits, and any exhibit designated by any other party, at the Hearing:

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
1	S&L Employment Application [ECF Nos. 85, 163-1, 163-2, 163-3, & 163-4]				
2	U.S. Trustee's Amended Objection to S&L Employment Application [ECF No. 154]				
3	Transcript of September 13, 2022, Hearing [ECF No. 179]				
4	Joinder by the Sandy Hook Plaintiffs [ECF No. 159]				
5	Reply to the U.S. Trustee's Objection to S&L Employment Application [ECF No. 166]				
6	Transcript of September 20, 2022, Hearing [ECF No. 194]				
7	Transcript of May 19, 2022, Hearing in IW Cases [ECF Nos. 163-22, 165-14]				
8	Omnibus Response in IW Cases [ECF No. 165-7]				
9	August 3, 2022, Hearing Transcript [ECF Nos. 63, 165-15]				
10	S&L June 2022 Time Records re Prepetition Services to the Debtor [ECF No. 163-7]				

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
11	Forbearance Agreement dated July 10, 2022 [ECF No. 26-8]				
12	Debtor's Schedules [ECF Nos. 121, 165-1]				
13	August 16, 2022, Email from R. Shannon to S. Jordan responding to AEJ Request for FSS to Seek Stay of Remand Order and Extension of Automatic Stay to AEJ				
14	August 16, 2022, Email from S. Jordan to R. Battaglia and K. Lee responding to FSS Response to AEJ Request for FSS to Seek Stay of Remand Order and Extension of Automatic Stay to AEJ				
15	August 17, 2022, Email from S. Jordan to R. Shannon re FSS Plans if AEJ Unable to Conduct Show for FSS				
16	August 19-22, 2022, Emails among K. Lee and S. Jordan re AEJ's Payment of Legal Expenses re Special Counsel				
17	S&L Fee Statement and Time Records re Services Provided to the Debtor from the Petition Date through September 20, 2022				
18	Schwartz Affidavit re Management Agreement in Connecticut Litigation				
19	Roddy Affidavit re Google Analytics Documents re Management Agreement in Connecticut Litigation				
20	Order of Travis County District Court finding Alter Ego with respect to the Heslin/Lewis Suit				
21	Transcript of August 2, 2022, Hearing before Connecticut Superior Court				

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
22	August 8, 2022, Email from R. Shannon to J. Martin re PQPR insider status and avoidance of PQPR lien				
23	June 30, 2022, Email from R. Shannon re PQPR P&L Statements				
24	May 11, 2022, Email from R. Shannon to M. Beatty and A. Moshenberg re Expediting Dismissal of Claims against IW Debtors and Attendant Remand of Removed Litigation				
25	May 11, 2022, Email from R. Shannon to R. Chapple and R. Williams re Expediting Dismissal of Claims against IW Debtors and Attendant Remand of Removed Litigation				
26	Declaration of R. Shannon re Testimony and Additional Documents S&L will seek to Introduce at Rehearing or in Connection with Administrative Expense Motion				
27	Presentation for January 20, 2023, Hearing on Shannon & Lee LLP's Rule 59 Motion				

S&L reserves the right to supplement, amend or delete any witness and exhibits prior to the Hearing. The S&L also reserves the right to ask the Court to take judicial notice of any document. S&L finally reserves the right to introduce exhibits previously admitted.

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Dated: January 18, 2023

SHANNON & LEE LLP

/s/ R. J. Shannon

Kyung S. Lee

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R. J. Shannon

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